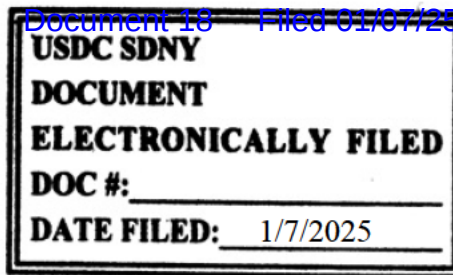


Higbee & Associates



A NATIONAL LAW FIRM

January 6, 2025

VIA ECF

Hon. Judge Margaret M. Garnett
Thurgood Marshall Courthouse
40 Foley Square
Courtroom 906
New York, NY 10007

RE: Second Request to Adjourn Initial Pretrial Conference and Request to Hold the Initial Pretrial Conference Remotely

Case: *Williams v. Galia Lahav Inc. et al.*, No. 1:24-cv-07834-MMG

Dear Judge Garnett,

The undersigned are counsel for the parties in the above-referenced matter. We write to respectfully request that the Court adjourn the Initial Pretrial Conference (“Conference”) scheduled with the Court on Wednesday, January 22, 2024 [See Doc. No. 10] to a date after Defendants file an answer to the Amended Complaint. We also write to respectfully request that the Court hold the Initial Pretrial Conference via a Microsoft Teams meeting.

Pursuant to Rule I(B)(5) of Your Honor’s Individual Rules & Practices, we are providing the following information in support of our request to adjourn the Initial Pretrial Conference.

- (1) On December 24, 2024, Plaintiff filed her First Amended Complaint (“FAC”) and added a new party, Galia Lahav International Ltd. See Doc. No. 13. Galia Lahav International Ltd. waived service of the summons (see Doc. No. 14), so its response to the FAC is due by February 24, 2025. Both defendants are represented by the same counsel, and Defendants plan to file one response to the FAC by February 24, 2024.

Currently, the Conference is scheduled for January 22, 2025 which is before the February 24, 2024 deadline for Defendant Galia Lahav International Ltd. to file a response to the Complaint. Counsel for the parties have continued preliminary settlement discussions, but Plaintiff’s counsel would like the opportunity to review Defendants’ response and defenses to the FAC and discuss Defendants’ position with Defendants’ counsel prior to the Conference. Adjourning the Conference to a date after February 24, 2025 would provide counsel with a chance to continue discussing the merits of the case and be in a better position to provide the Court with a substantive assessment of the merits of the case and each party’s position.

- (2) The Conference is currently scheduled for January 22, 2025.
- (3) This is the parties’ second request for an adjournment of the Conference.
- (4) Counsel for all parties consent to this proposed adjournment.

- (5) Defendants' Counsel, Mr. Bernstein, is scheduled to be on trial in the Southern District of New York beginning on February 24th and expects that trial to last no more than two weeks. He would be available the week of March 10th (other than March 13th) and the week of March 17th.

Pursuant to Rule II(A)(2) of Your Honor's Individual Rules & Practices, we respectfully request that the Court hold the Initial Pretrial Conference via a Microsoft Teams meeting. Ms. Leath, who has been admitted to this matter pro hac vice, is located in Atlanta, Georgia. She has been the main point of contact for this matter and working directly with Mr. Bernstein. Ms. Leath would like to attend the Initial Conference and would only be able to do so via a Microsoft Teams meeting.

Respectfully submitted,

/s/ Taryn Rose Murray
Taryn Rose Murray, Esq.
Attorney for Plaintiff

/s/ Jayma C. Leath
Jayma C. Leath, Esq. (pro hac vice)
Attorney for Plaintiff

/s/ Hartley T. Bernstein
Hartley T. Bernstein, Esq.
Attorney for Defendants

Request GRANTED. The Initial Pretrial Conference that was scheduled for January 22, 2025, is ADJOURNED to **Wednesday, March 12, 2025, at 9:30 a.m.** Additionally, the parties' joint letter and proposed civil case management plan are now due on **March 5, 2025**. The Initial Pretrial Conference will be held as a video conference via Microsoft Teams. The Teams conference information is below, and counsel are referred to Rule II(A)(2) of the Court's Individual Rules & Practices regarding video conferences. The Clerk of Court is directed to terminate Dkt. No. 17.

Teams Meeting ID: 236 467 262 971 // Passcode: ye9NR6cp

SO ORDERED. Date 1/7/2025


HON. MARGARET M. GARNETT
U.S. DISTRICT JUDGE